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UNITED STATE DISTRICT COURT  
DISTRICT OF OREGON, PORTLAND DIVISION  
LAND

ANGELA TORRES, an Individual	)	
	)	Case No: 3:17-CV-01270-AC
Plaintiff,	)	
	)	Defendants Objection to Plaintiff's
vs.	)	Motion to Strike Answer of
	)	Adult Care Search
	)	Defendants Motion to Terminate
Alireza Zamanizadeh, aka Ali Zamani	)	Temporary Restraining Order on
An Individual, Adult care search a	)	Adult Care Search
Alireza Zamanizadeh), a a foreign non-	)	
Profit corporation	)	

Come now Defendant's Adult Care Search and Ali Zamani together make their objection to Plaintiffs' Motion to Strike Adult Care Search answer, and Defendants Motion to terminate the Preliminary injunction and Temporary Restraining Order issued on Adult Care Search and make the following statements;

### BACKGROUND

(1)

For the brief summary of this case defendant states; on or about May 2016 plaintiff seek the introduction with defendants Zamani. Plaintiff learned about defendant Zamani's business and Soon after introduction, plaintiff on her own imitative made donation to Adult Care Search unbeknown to Zamani. When Zamani asked the reason, plaintiff stated she would like to be part of the cause defendants company.

Later on or about couple weeks plaintiff ask for Zamani's help for her imitating her divorce from her husband who she had been separated for over (7) years. Zamani directed her to obtain legal

1 attorney who can assist her in such.

2  
3 Defendant Zamani learned at later time that plaintiffs motive was to abuse Zamani's company  
4 for hiding her assets during civil proceeding. During September 2016 and November 2016 while  
5 Zamani was overseas for business and asked every one due to the status of the country was  
6 traveling no email and or information be communicated with him. Plaintiff continued and  
7 disregard zamanis request for not contacting him and as the result she caused severe financial  
8 damages to Zamani. Plaintiff further upon Zamani's return stated and agreed she had caused  
9 damages and agreed to assist and help Zamani.  
10

11 Upon return of Zamani Plaintiff authorized Zamani to obtain a loan on her assets she had  
12 received through divorce court since her actual cash which she was awarded had not yet been  
13 received by plaintiff.

14 During May 2016 and December 2016 and thereafter she continuously asked Zamani to be with  
15 her and that she was in love with Zamani even though Zamani continuously denied her for such  
16 relationship.  
17

18 On or about March 2017 Plaintiff filed a complaint asserting several bogus claims, through her  
19 legal representative David Richardson. On or About November 2017 when through settlement  
20 offer Zamani informed Plaintiff attorney about the loan obtained which was matured, Plaintiff's  
21 attorney conspired with defendant Zamani's attorney, to which Plaintiff attorney filed Motion for  
22 Preliminary Injunction and Temporary Restraining Order. Zamani Was completely unaware of  
23 such Motion and defendants Zamani and Adult Care Search attorney Failed to appear and  
24 represent the defendants at the hearing and as such Plaintiff obtain an TRO against defendant for  
25 purpose of creating inability to have legal representation. Defendant's attorney Tim Colderbank  
26 even failed to appear in hearing when ordered by Honorable Judge Acosta. Plaintiff attorney

1  
2 and defendant through Ali Zamani agreed to abate and continued and agreed and understood  
3 that Adult care Search a corporation does not have an attorney. Plaintiff is simply is  
4 manipulating the court system for purpose of revenge as it is said " Hell Half No Furry Like A  
5 Woman Scorned".  
6

7 **For: Plaintiffs Motion to Strike Adult Care Search Answer**

8 (2)

9 Both parties had agreed and through court's proceeding plaintiff agreed and understood Adult  
10 Care Search cannot obtain a legal representation based on the TRO obtained by means of  
11 attorney conspiring together to put the defendant in disadvantage and financial lock.  
12

13 (3)

14 When the law was put in place did it included that when corporation is deliberately and  
15 by attorneys conspired together for creating financial inability to obtain legal  
16 representation such law apply to such circumstances as well, or should the court make  
17 that as Case Law for future and stop parties and attorneys by not allowing them unable  
18 the corporations to be justified and to avoiding further abuse of due process?

19 We have come upon audio recordings that will be presented as evidence against  
20 plaintiffs intend to abuse and misuse the law to gain financial benefit by her own words  
21 which recently was found.

22 The previous attorney for over a year and half through several proceeding at this same  
23 court decided not to ask and decided not to seek such action because there was an  
24 agreement they would not and court has been a witness to such agreement.  
25

26 Plaintiff even has tried to use the means of us attorney general by filing falsified  
statements and lies to under oath that she never signed any power attorney and when

1 she was confronted she admitted she had signed the power attorneys and even kept  
2 such information from her own original attorney until defendant notified her attorney  
3 during the settlement negotiation on or about November 2016 when right after the  
4 negotiation defendant attorney conspired with plaintiff's attorney by not showing up at  
5 preliminary hearing for temporary restraining order. This caused and has cause the  
6 defendant to be unable financially obtain legal representation.  
7

8 (4)

9  
10 Now by means of abusing the due process plaintiff higher new group of representative  
11 and the new group see it beneficial to seek for such wrongful action to dismiss  
12 defendant answer. Is this not a abuse of law and due process? While plaintiff in her own  
13 complaint states that she wrongfully wanted to lie to court for her purpose and for her  
14 propose of deceiving the divorce court and further confirms that in her complaints in the  
15 this United States District courts and yet again abusing the due process obtaining a  
16 TRO to put the defendant corporation in and disadvantage and by manipulating the  
17 judges seat to obtain a judgment against the defendant. Now is the Justice this court  
18 practices and wants to be known?  
19

20 (5)

21 Defendants Request from the Court to deny plaintiffs Motion to Strike Adult Care search  
22 and or respectfully consider terminating the temporary restraining order for the purpose  
23 of giving defendants ability to be able to obtain legal consul to be represented in the  
24 matter as it's the only way Justice can be severed.  
25  
26

**For: Defendants' Motion to Terminate Temporary Restraining  
Order against Adult Care Search**

(5)

For Motion to terminate restraint order on preliminary injunction defendants Adult care search and Ali Zamani come before the court and make the following statement;

Comes Now the defendants adult care search ask the court to terminate the wrongful Temporary Restraining order previously issued against the defendants adult care search to allow the corporation to have financial means to obtain legal representation to be represented in this proceeding. Based on the information provided herein and on both objection to Motion to strike and defendant motion to terminate temporary restraining order, Defendants intent to introduce the audio recordings consensually recorded from on or about January 1 , 2017 through March of 2017 as evidence for the plaintiffs conspiring to use the legal proceeding for personal gain and revenge for being denied.

**CONCLUSION**


Defendants Pray to the court for taking this matter at its merits and consider the action of the plaintiff which nothing short of playing with the court system and manipulation of the legal system for obtaining personal gain and satisfaction by destroying the defendants business and life. Even though the law states that corporation must be represented in the court, does the same law agrees and states the one party can abuse and manipulate the same law by maneuvering and conspiring to abuse the court system? NO law shall be abused and no one shall cause one to be in disadvantage by

1  
2 means of manipulation and lies and to gain wrongful judgment.

3 Court should not allow any party in a case to be able by means of conspiring to create  
4 inability for defendant to obtain legal representation and then seek striking the  
5 defendant answer and later obtain judgment. This is not nor shall be allowed to become  
6 a pattern of abusing the legal do process and abuse of the law. Let this court make this  
7 a case law that allows the law to properly adjudge a case.  
8

9  
10 Defendant Pray for the court to deny the Plaintiff's Motion and or Pray for the Court to  
11 Terminate the Temporary Restraining Order in order to allow the Defendants to have  
12 ability to have financial ability obtain legal representation so can be adequately be  
13 represented in this proceeding.  
14

15 Respectfully submitted on this 16<sup>th</sup> day of May 2019.

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20 Ali Zamani Personally  
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24  
25  
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